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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

EPIC GAMES, INC.,

Case No. 4:20-cv-05640-YGR

Plaintiff, Counter-defendant,

V.

APPLE INC.,

Defendant, Counterclaimant.

IN RE APPLE IPHONE ANTITRUST
LITIGATION

Case No. 4:11-cv-06714-YGR

DONALD R. CAMERON, *et al.*,

Case No. 4:19-cv-03074-YGR

Plaintiffs,

V

APPLE INC

JOINT STATEMENT REGARDING VALIDATION OF DOCUMENT PRODUCTIONS

Judge: Hon. Yvonne Gonzalez Rogers

Defendant.

1 **Joint Statement:** In connection with negotiations concerning a draft protocol to
2 govern discovery of electronically stored information in the above-captioned actions, Plaintiffs
3 and Defendant Apple Inc. (“Apple”) (collectively, “the Parties”) filed with the Court a joint
4 statement on October 26, 2020, stating in part that the Parties continued to meet and confer
5 regarding validation procedures to test the sufficiency and accuracy of the Parties’ productions.
6 The Parties stated that they had agreed to either (i) reach agreement on validation procedures by
7 November 9, 2020, or (ii) if the Parties cannot reach agreement, submit any outstanding issues in a
8 joint statement to Magistrate Judge Hixson by November 9, 2020.

9 On November 9, 2020, the Parties filed with the Court a joint statement, stating that
10 the Parties had agreed to continue negotiations and either (i) reach agreement on validation
11 procedures by November 13, 2020, or (ii) if the Parties cannot reach agreement, submit any
12 outstanding issues in a joint statement to Magistrate Judge Hixson by November 13, 2020.

13 The Parties have continued to negotiate and have made additional progress but
14 have not yet reached agreement on validation procedures. The Parties have agreed to extend the
15 deadline for submission of an agreement or dispute to November 20, 2020 at 5:00 p.m. Pacific
16 Time.

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1 Dated: November 13, 2020

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7 Lauren A. Moskowitz
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9 Respectfully submitted,

10 By: /s/ Yonatan Even
11 Yonatan Even

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13 Dated: November 13, 2020

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14 By: /s/ Jay P. Srinivasan
15 Jay P. Srinivasan

16 *Attorneys for Defendant Apple Inc.*

17 **E-FILING ATTESTATION**

18 I, Jay P. Srinivasan, am the ECF User whose ID and password are being used to file
19 this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the
20 signatories identified above has concurred in this filing.

21 /s/ Jay P. Srinivasan

22 Jay P. Srinivasan